

TUCKER ELLIS LLP
CHELSEA MIKULA SBN 289330
chelsea.mikula@tuckerellis.com
950 Main Avenue, Suite 1100
Cleveland, OH 44113
Telephone: 216.592.5000
Facsimile: 216.592.5009

TUCKER ELLIS LLP
AMANDA VILLALOBOS SBN 262176
amanda.villalobos@tuckerellis.com
NICHOLAS JANIZEH SBN 307816
nicholas.janizeh@tuckerellis.com
515 South Flower St., 42nd Floor
Los Angeles, CA 90071-2223
Telephone: 213.430.3400
Facsimile: 213.430.3409

Attorneys for Defendant Red Roof Franchising LLC

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

J.M., an individual,

Plaintiff,

v.

RED ROOF FRANCHISING, LLC, et al.,

Defendants.

) Case No. 2:24-cv-03384-KJM-JDP

) Hon. Kimberly J. Mueller

) **STIPULATION TO EXTEND TIME TO
RESPOND TO THE COMPLAINT AND
ORDER**

Pursuant to Local Rule 144(a), Plaintiff J.M. (“Plaintiff”) and Defendant Red Roof Franchising, LLC (“RRF”) (collectively, with Plaintiff, the “Parties”), by and through their respective counsel, hereby stipulate as follows:

1. On December 3, 2024, Plaintiff filed a complaint captioned *J.M. v. Red Roof Franchising, LLC*, Case No. 2:24-cv-03384-KJM-JDP in the Eastern District of California.

2. Pursuant to the Waiver of Service of Summons (ECF No. 11), RRF’s response to Plaintiff’s complaint is due on March 24, 2025.

3. On February 27, 2025, Plaintiff filed a proposed amended complaint (ECF No. 20).

4. On March 12, 2025, the Court issued an order directing Plaintiff to file a motion for leave to amend her complaint (ECF No. 22).

5. In light of the Court’s March 12 order, the parties have agreed to extend RRF’s deadline to respond to the complaint by sixty (60) days to May 23, 2025 to give Plaintiff time to file her motion and have it ruled on by the Court.

WHEREFORE, IT IS HERBY STIPULATED AND AGREED that Red Roof’s deadline to respond to Plaintiff’s complaint shall be extended, up to and including May 23, 2025.

///

///

1 Dated: March 17, 2025

Respectfully submitted,

3 /s/ Amanda Villalobos

4 Amanda Villalobos 262176
5 amands.villalobos@tuckerellis.com
6 TUCKER ELLIS LLP
7 515 South Flower St., 42nd Floor
8 Los Angeles, CA 90071-2223
9 Telephone: 213.430.3400
10 Telefax: 213.430.3409

8 /s/ Chelsea Mikula

9 Chelsea Mikula SBN 289330
10 chelsea.mikula@tuckerellis.com
11 TUCKER ELLIS LLP
12 950 Main Avenue, Suite 1100
13 Cleveland, OH 44113-7213
14 Telephone: 216.592-5000
15 Telefax: 216.592.5009

*Attorneys for Defendant Red Roof Franchising,
LLC*

15 Dated: March 18, 2025

Respectfully submitted,

16 /s/ Penny L. Barrick (as authorized on 3/17/25)

17 Penny L. Barrick (Pro Hac Vice)
18 Penny.barrick@babinlaws.com
19 BABIN LAW, LLC
20 10 W. Broad Street, Floor 9
21 Columbus, Ohio 43215
22 614-761-8800

Attorneys for Plaintiff J.M.

ORDER

The foregoing stipulation of the parties is approved. Red Roof Franchising, LLC's new responsive pleading deadline is extended to May 23, 2025.

IT IS SO ORDERED.

DATED: March 18, 2025.


UNITED STATES DISTRICT JUDGE

TUCKER ELLIS LLP
Chicago ♦ Cleveland ♦ Columbus ♦ Los Angeles ♦ San Francisco ♦ St. Louis